

176488

STATE OF KANSAS

DEPT. OF TRANSPORTATION

22 JUN 12 AM 11:43

KANSAS DEPARTMENT OF TRANSPORTATION

BUREAU OF TRAFFIC ENGINEERING

Thacher Building

217 SE Fourth Street, Fourth Floor

Topeka, Kansas 66603-3504

Ph. (785) 296-3618 FAX (785) 296-3619

TTY (785) 296-3585

June 4, 2002

Bill Graves
Governor

E. Dean Carlson
Secretary of Transportation

Mike Crow, P.E.
Chief

RE: 23 CFR Part 630
FHWA Docket No. FHW-2001-11130 - 49
RIN 2125-AE29
Work Zone Safety

U.S. Department of Transportation
Dockets Management Facility, Room PL-401
400 Seventh Street
Washington, DC 20590

To Whom It May Concern:

Thank you for the opportunity to comment regarding the Federal Highway Administration's (FHWA) proposed rule making on Work Zone Safety (23 CFR Part 630). It is understood that the FHWA has identified goals for maximizing the availability of roadways during construction and maintenance, while minimizing impacts on road users and highway workers, and would like to know if the current provisions in their regulations are adequate to address today's work zone issues.

Recently members of the Kansas Department of Transportation (KDOT) met to discuss these proposed comments on Work Zone Safety, including representatives from Design, Construction and Maintenance, and Traffic Engineering. These representatives were asked to complete a survey conducted by the American Association of State Highway Transportation Officials (AASHTO), in cooperation with FHWA, regarding 23 CFR Part 630. This survey was identical to the Request for Comments portion of the proposed rulemaking. The surveys were completed and returned to AASHTO on or before Friday, April 12, 2002. KDOT's specific responses regarding these questions are shown on the surveys that were completed and sent to AASHTO.

KDOT wanted to send an additional letter of comment regarding this proposed rulemaking, as we are concerned with the possibility of having a national policy on mobility and



U.S. Department of Transportation

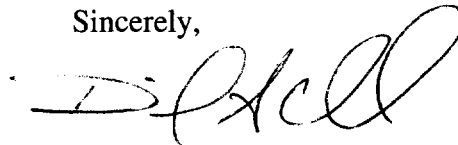
Page 2

June 4, 2002

safety in highway construction and maintenance work zones. Certainly, we are committed to improving safety and mobility in work zones in Kansas and across the country. However, we believe that the current policies, practices, and guidance given in Part Six of the Manual on Uniform Traffic Control Devices (MUTCD), as well as in AASHTO's A Policy on Geometric Design of Highways and Streets, are adequate information for the maintaining agency to make informed Engineering decisions on work zones in their area. We believe that across the country, DOT's and other maintaining agencies are faced with challenge of planning and constructing safe and efficient work zones within their states. We believe that the FHWA should continue to emphasize safe and innovative practices with regard to work zones, without the need for a national policy. We believe that improvements to work zones initiated at the local level would be a much more effective way to improve work zones nationally.

Thank you again for allowing us to comment on this proposed rulemaking. If you have any questions or comments please feel free to call this office at (785) 296-3618.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Church', with a stylized, flowing script.

David A. Church, P.E.
State Traffic Signing Engineer

DAC:srd

cc: Warren L. Sick, Asst. Secretary and State Transportation Engineer
Steve Woolington, Director of Operations
Jim Kowach, Chief of Design
James O. Brewer, Road Engineering Manager
Dean M. Testa, Chief of Construction and Maintenance
Mike Crow, Chief of Traffic Engineering